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AT&T PENSION BENEFIT PLAN - NONBARGAINED PROGRAM and AT&T, INC.

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WILLIAM GRAHAM

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WILLIAM GRAHAM,

Plaintiff,

vs.

AT&T PENSION BENEFIT PLAN -  
NONBARGAINED PROGRAM; AT&T,  
INC.; and DOES 1-10,

Defendants.

CASE NO. 11-CV-4085 TEH

**STIPULATION TO RESCHEDULE CASE  
MANAGEMENT CONFERENCE AND  
[PROPOSED] ORDER**

Complaint Filed: August 15, 2011

1 STEPHEN H. HARRIS (SB# 184608)  
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2 M'ALYSSA C. MECENAS (SB# 272075)  
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Attorneys for Defendants  
7 AT&T PENSION BENEFIT PLAN - NONBARGAINED PROGRAM and AT&T, INC.  
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1 Pursuant to Civil Local Rules 16-2 and 7-12, the Parties stipulate and jointly move for an  
2 order from the Court rescheduling to June 11, 2012 the Case Management Conference currently  
3 scheduled to be held on April 30, 2012, and for relief from the deadlines associated with that  
4 conference.

5 WHEREAS:

- 6 1. On December 12, 2011, the Court set the Case Management Conference for March 19, 2012  
7 at 1:30 p.m.
- 8 2. The Parties reached a tentative agreement to settle, but the Parties require additional time  
9 before the Case Management Conference to finalize and document their agreement.
- 10 3. The Parties previously filed a stipulated request for the Court to continue the deadline to hold  
11 an early neutral evaluation (ENE) from March 9, 2012 to April 16, 2012. By order dated  
12 March 7, 2012, the Court granted the Parties' request. The Parties concurrently have filed  
13 another stipulated request for the Court to continue the deadline to hold an ENE to May 28,  
14 2012. In the unlikely event that the settlement is not finalized, the Parties wish to have two  
15 weeks between the ENE and the Case Management Conference to allow sufficient time for  
16 the Parties to prepare an updated Joint Case Management Statement.
- 17 4. Rescheduling the Case Management Conference will further the interests of judicial  
18 efficiency and conserve resources.

19 IT IS HEREBY STIPULATED by and between the Parties hereto that the Case  
20 Management Conference be rescheduled from April 30, 2012 to June 11, 2012.  
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1 Dated: April 10, 2012

PATRICK W. SHEA  
STEPHEN H. HARRIS  
M'ALYSSA C. MECENAS  
PAUL HASTINGS LLP

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4 By: /s/ Patrick W. Shea  
PATRICK W. SHEA

5 Attorneys for Defendants  
6 AT&T PENSION BENEFIT PLAN – NONBARGAINED  
PROGRAM and AT&T, INC.

7 Dated: April 10, 2012

ROGER P. ROZEK

8 By: /s/ Roger P. Rozek  
9 ROGER P. ROZEK

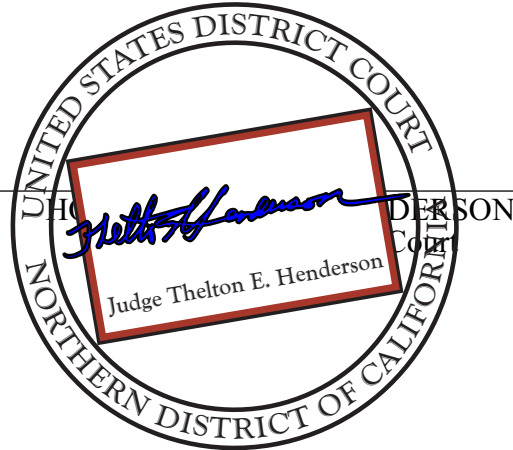
10 Attorney for Plaintiff  
11 WILLIAM GRAHAM  
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~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED that the Case Management Conference is hereby rescheduled from April 30, 2012 to June 11, 2012. All deadlines associated with that conference are hereby reset. The Parties' Joint Case Management Statement is now due no later than June 4, 2012.

DATED: 04/10, 2012

By: \_\_\_\_\_



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